

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

DEFENDANT'S RESPONSE TO COURT'S INQUIRY REGARDING VOIR DIRE

COMES NOW Jeffrey A. Sterling, by counsel, and for his Response to the Court's Inquiry
Regarding Voir Dire, states as follows:

Mr. Sterling objects to the following Proposed Voir Dire as set forth in the filing dated October 11, 2011. (Docket No. 257)

1. No objection.
2. No objection.
3. The defendant objects to this question as it does not relate to any issue in this case.
4. The defendant objects to this question as it is irrelevant and intrusive to prospective as it seeks disclosure of private information unrelated to the ability to serve as a juror.
5. No objection.
6. No objection.
7. No objection.
8. The defendant objects to this question as it is irrelevant and intrusive to prospective

jurors as it seeks disclosure of private information unrelated to the ability to serve as a juror. This question is objectionable as well as it seeks to help the United States find jurors who only view the CIA in a good light and that issue is not raised in the Indictment.

9. No objection.

10. The defendant objects to this question as it is irrelevant and intrusive to prospective jurors as it seeks disclosure of private information unrelated to the ability to serve as a juror. This question is objectionable as well as it seeks to help the United States find jurors who only view the CIA in a good light and that issue is not raised in the Indictment.

11. The defendant objects to this question as it is irrelevant and intrusive to prospective jurors as it seeks disclosure of private information unrelated to the ability to serve as a juror.

12. The defendant objects to this question as it is irrelevant and intrusive to prospective jurors as it seeks disclosure of private information unrelated to the ability to serve as a juror.

13. No objection.

14. The defendant objects to this question as it is irrelevant and intrusive to prospective jurors as it seeks disclosure of private information unrelated to the ability to serve as a juror. In addition, the defense is not aware of any information that will be disclosed in this case that will remain classified following its introduction in evidence other than names of certain witnesses.

15. No objection.

16. No objection.

17. No objection.

18. No objection.

JEFFREY A. STERLING
By Counsel

By: /s/
Edward B. MacMahon, Jr.
VSB No. 25432
Edward B. MacMahon, Jr., PLC
P.O. Box 25
107 East Washington Street
Middleburg, VA 20118
(540) 687-3902
(540) 687-6366
ebmjr@macmahon-law.com

/s/
Barry J. Pollack (admitted *pro hac vice*)
Miller & Chevalier Chartered
655 Fifteenth St. N.W. Suite 900
Washington, DC 20005
(202) 626-5830
(202) 626-5801 (facsimile)
bpollack@milchev.com
Counsel for Defendant Jeffrey A. Sterling

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: /s/
Edward B. MacMahon, Jr. (VSB # 25432)
Edward B. MacMahon, Jr., PLC
107 East Washington Street
P.O. Box 25
Middleburg, VA 20118
(540) 687-3902
(540) 687-6366 (facsimile)
ebmjr@macmahon-law.com
Counsel for Jeffrey A. Sterling